

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In Re: Gladys Hicks Washington**

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**CASE NO. 21-33847-KRH  
Chapter 13**

AKA: Gladys Irene Washington

Debtor Address(es): 3306 Austin Avenue  
Henrico, VA 23222

Last four digits of Social Security No(s): 4249

**MOTION TO DISMISS, NOTICE OF MOTION AND NOTICE OF THE HEARING**

**NOW COMES** the Chapter 13 Trustee and moves this Court to dismiss this case as provided in 11 U.S.C. 1307(c)(1) for unreasonable delay that is prejudicial to creditors due to the debtor(s) having failed to address claim and/or funding issues that will prevent the plan from paying creditors as proposed in the current confirmed plan.

Carl M. Bates, Chapter 13 Trustee, has filed papers with the court to dismiss this case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before seven (7) days before the date of the hearing, you or your attorney must:

  X   File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
(800) 368-6868

\_\_\_\_\_ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
(804) 355-6888

You must also mail a copy to:

Carl M. Bates, Chapter 13 Trustee  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218

  X   Attend the hearing on the motion scheduled to be held on **June 01, 2022** at **11:00 AM** at United States Bankruptcy Court.

**REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the “Zoom Request Form”), which is available on the Court's internet website at [www.vaeb.uscourts.gov](http://www.vaeb.uscourts.gov), on the page titled, “Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information.” Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

\*\*\*The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge’s attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.\*\*\*

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: April 21, 2022

/s/ Carl M. Bates

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
(800) 555-6888

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
VSBN 27815

Certificate of Service

I hereby certify that I have this **21st day of April, 2022**, by mail, hand or electronically delivered a true copy of the foregoing Notice of Motion and Motion to the debtor(s) **Gladys Hicks Washington, 3306 Austin Avenue, Henrico, VA 23222** and debtor(s) attorney, **James E. Kane, Esquire, via e-mail: jkane@kaneandpapa.com**.

/s/ Carl M. Bates

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Carl M. Bates  
Chapter 13 Trustee

Carl M. Bates  
Chapter 13 Trustee  
P.O. Box 1819  
Richmond, VA 23218  
(804) 278-1815